

FILED

NOV - 9 2022

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WILLIAM PILGRIM,

Defendant.

No.

4:22-CR-631-AGF/PLC

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about July 25, 2022, in the City of St. Louis, within the Eastern District of Missouri,

WILLIAM PILGRIM,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in excess of 40 grams.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(B).

COUNT TWO

The Grand Jury further charges that:

On or about July 25, 2022, in the City of St. Louis, within the Eastern District of Missouri,

WILLIAM PILGRIM,

the defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime

which may be prosecuted in a court of the United States, that is, possession with intent to distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in excess of 40 grams; as set forth in Count One.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT THREE

The Grand Jury further charges that:

On or about July 25, 2022, in the City of St. Louis, within the Eastern District of Missouri,

WILLIAM PILGRIM,

the defendant herein, did unlawfully and knowingly use and maintain a place for the purpose of distributing or using fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count One; the Defendant shall forfeit to the United States of America any property: constituting or derived from any proceeds obtained, directly or indirectly, as the result of such violation(s) and any property used or intended to be used, in any manner or part to commit or to facilitate the commission of such violation(s).

2. Subject to forfeiture is a sum of money equal to the total value of any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the violation(s) set forth in Count One.

3. Specific property subject to forfeiture includes, without limitation, the following:
 - a. Approximately \$7,249 in United States currency
4. If any of the property described above, as a result of any act or omission of the

Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

SAYLER A. FLEMING
United States Attorney

CASSANDRA J. WIEMKEN, #91586(KY)
Assistant United States Attorney